

Privacy Notice – Mandatum plc’s shareholders

1. General

The purpose of this Mandatum plc’s (hereinafter also referred to as “**Mandatum**”) Privacy Notice is to provide you with information on the processing of our shareholders’ personal data in accordance with the EU’s General Data Protection Regulation (EU) 2016/679 (hereinafter “**GDPR**”) and other applicable data protection legislation.

The Privacy Notice describes, among other things, what personal data does Mandatum plc process on its shareholders, what sources do we use to collect such data, for what purposes do we process the data and with whom do we share the data. We may update this notice from time to time, when necessary, since we are constantly improving our business, and changes may occur in our personal data processing as well.

For any questions or inquiries regarding this Privacy Notice, the processing of your personal data or your data subject rights, please contact us via the communication channels provided below.

2. Data controller and contact details

Mandatum plc
Business ID 3355142-3

Visiting address: Bulevardi 56, 00120 Helsinki, Finland
Postal address: PO Box 627, 00101 Helsinki, Finland

Customer Service:
0200 31100 (Inc/mnc), Mon–Fri 9–17

3. Data Protection Officer’s contact details

Mandatum Group’s Data Protection Officer

Email: dpo@mandatum.fi
Postal address: Mandatum, PL 627, 00101 Helsinki, Finland

4. What personal data do we collect and process?

The personal data we collect and otherwise process can be divided into the following groups of data, presented below with some examples of personal data processed within each group. Please note that the lists of examples are not exhaustive.

- Shareholder's basic information, such as name, personal identity code, date of birth or other similar identifier, contact information, language, and nationality.
- Data relating to holdings, such as number of shares and votes as well as the rights attached to those instruments.
- Information of major shareholdings (flagging notifications).
- Information on guardianship of a shareholder.
- Information on shareholders' participation in the general meetings and other similar shareholder and investor events of ours.
- Data on proxies and aids representing and/or assisting shareholders in general meetings and other similar shareholder and investor events, and the basis for such representation.
- Other information necessary for the organization of general meetings, such as information on the authentication method, registration date, preliminary questions, and voting information, as well as the time of arrival and departure of the participant of the meeting.
- Other information on registers for general meetings (such as the shareholder register of the record date and the temporary shareholder register) required by the Limited Liability Companies Act, such as information on nominee-registered shareholders and the amount of their shares.
- Data on the use of shareholder's rights.
- IP address, authentication method and log information for the technical maintenance and monitoring of the general meeting service.
- Other additional information provided by shareholders in connection with registration to general meetings and other similar shareholder and investor events.
- Information on marketing consents and prohibitions.

5. Sources of personal data

We may collect your personal data from you, your representative or the organization you represent, and/or from other information sources, such as the shareholder register and database kept by the central securities depository Euroclear Finland Ltd. In addition, we may collect personal data from account operators and public registers within the limits of the applicable legislation. Your consent is requested when necessary.

Personal data collected in relation to the organization of general meetings are mainly collected from the shareholders themselves when registering to the meeting. If a shareholder is assisted by aid or represented by a proxy, the shareholder shall provide the necessary personal data of the assistant or representative as well. Based on the personal data provided in connection with the registration, the number of shares of the shareholder is retrieved on the general meeting record date from the list of shareholders created by Euroclear Finland Ltd. Additionally, the voting instructions for nominee-registered shareholders represented by account operators are registered into the general meeting information.

6. Purpose and legal basis for processing personal data

Our legal obligations

Processing of the personal data of shareholders and their proxies and/or aids is primarily based on legal obligations and statutory requirements set for us in the applicable legislation, such as the Limited Liability Companies Act (624/2006) and the Securities Market Act (746/2012). In order to comply with these obligations, we may process personal data, e.g., for the following purposes:

- Identification of shareholders
- Maintaining the shareholder register in accordance with the Limited Liability Companies Act
- Organization of general meetings, including the maintaining of statutory registers relating to general meetings (for example, a shareholder register of the record date and a register of shareholders, their proxies and/or aids who registered and participated in the meeting)
- Other communication with shareholders
- Payment of dividends and execution of capital returns
- Preparing and publishing stock exchange releases
- Publishing information about significant holdings and largest shareholders on Mandatum's website
- Fulfilling other statutory requirements that obligate a publicly listed company.

In principle, the personal data collected in connection with the organization of general meeting shall only be processed for purposes necessary for organizing the general meeting, such as verifying the identity of the registrant, validating their right to participate, preparing the meeting's participant list, voting list and possible voting tickets, organizing a voting and managing potential questions and requests for the floor.

Other legal bases

In addition to our statutory obligations, we may process your personal data on the basis of your explicit consent or the legitimate interest of Mandatum plc or a third party, such as another company of Mandatum Group.

Mandatum has a **legitimate interest** in processing personal data for the provision and marketing, including direct marketing, of our Group companies' services. We market our products and services by phone, by letter and electronically without an explicit consent, within the limits of and when permitted by the applicable legislation. You have the right to object to marketing and other communications based on a legitimate interest either immediately upon receiving electronic or telephone marketing, or at any time by contacting our customer service.

On the basis of a legitimate interest, we can also process personal data for, among other things, the development of our business and ICT systems, for quality control and risk management, to defend ourselves against complaints, lawsuits and other legal claims, and to establish, exercise or defend a legal claim. We record calls and store electronic communications for, inter alia, documentation, quality control and development

purposes. Footage from surveillance cameras inside and outside our offices may be recorded to ensure the safety of the people visiting our premises.

In certain situations, we may also request your explicit **consent** for the processing of your personal data. These situations include, for example, an explicit consent for electronic direct marketing, when required by the legislation. We provide more detailed information about the intended processing of your personal data when asking for your consent to such processing. If you have given us your consent for the processing of personal data, you also have the right to withdraw your consent at any time, for example in connection with a marketing message you receive or by contacting our customer service. Please note that in some situations we may process your personal data for direct marketing also on the basis of our legitimate interests without your explicit consent, in which cases you shall also have the right to object to such processing as described above.

7. Automatic decision-making and profiling

Profiling means automated processing of personal data, involving, for example, the assessment or anticipation of a person's areas of interest or behavior. We use profiling to target direct marketing in an effort to offer each person the products and services that are most suited and relevant for him/her. In targeting of direct marketing, we may use information received from you, public registers and other sources as described above in section 5 of this Privacy Notice. You have the right to object to such targeting and the direct marketing based on it either immediately upon receiving the electronic or telephone marketing, or at any time by contacting our customer service.

The profiling carried out in connection with the marketing or other processing of Mandatum plc's shareholders' personal data does not include automated decision-making, i.e. making decisions based solely on automated processing of personal data that have significant legal effects or other similar significant effects.

8. Recipients and transfers of personal data

Disclosing and publishing of personal data

Mandatum plc may disclose personal data to third parties when permitted or required by law. Prior to disclosing any data, we always ensure that there is a legal basis for the disclosure and that the disclosure is conducted in compliance with applicable regulatory obligations.

Based on the personal data collected in connection with the general meetings, we establish a list of votes and a summary of the votes cast, which are attached to the minutes of the meeting. The list of votes contains information on the name of the shareholder and of a possible proxy and/or aid, number of the vote ticket (participant number), number of shares by share type, number of votes, the basis of representation and the means of attendance. According to the Limited Liability Companies Act, Mandatum plc is obliged to keep the minutes of the general meeting together with its attachments available to all shareholders, and to also deliver a copy of the minutes to a shareholder on request.

At the general meeting, the shareholder register is also kept available in accordance with the Limited Liability Companies Act. The register includes the names of shareholders, municipality, and the number of shares and votes according to the record date of the meeting. The register also contains information on nominee-registered shareholders who have temporarily registered in the register of shareholders for the general meeting.

Where necessary, the personal data processed in order to organize the general meeting may be shared with third parties involved in organizing the meeting if required in their operations for such purposes. Personal data processed in relation to general meetings is not disclosed for commercial purposes, unless an explicit consent from the data subject for such processing is obtained.

In addition, Mandatum plc has a legal obligation to publish and keep available information on significant shareholdings and our largest shareholders on our company's website. The information to be published includes the name of the shareholder, the number of shares, the percentage of all shares, and information on the change in share ownership over a period of one month for our one hundred (100) largest shareholders. We also publish information regarding, for example, flagging notifications received by Mandatum and other corporate events and announcements published due to regulatory requirements or otherwise.

Information about shareholders can also be disclosed to authorities, such as supervisory or tax authorities, as well as to other Mandatum Group companies.

Data processors and transfers out of the European Economic Area

We also use third-party service providers (subcontractors), who may process personal data on behalf of Mandatum to the extent necessary to provide the acquired service. Such subcontractors include, for example, our partners who we use in organizing general meetings and other shareholder events, as well as producing our ICT services.

In this context, personal data may need to be transferred outside the EU or EEA, provided that the conditions set by data protection legislation are met. We base the transfers of personal data on transfer mechanisms permitted by legislation, such as the EU Commission's decision on the adequate level of data protection of the receiving country (see [an up-to-date list of adequacy decisions on the Commissions website](#)) or standard contractual clauses (hereinafter “SCCs”) approved by the EU Commission (see [SCCs on the Commissions website](#)). If necessary, we also supplement them with various additional safeguards in order to properly guarantee adequate data protection.

9. Retention periods of personal data

We store your personal data only for as long as it is required in order to comply with our legal obligations or it is otherwise necessary for the purposes for which the data was collected or otherwise processed. When personal data is no longer needed or required to be retained, it will be deleted or anonymized. The retention periods may vary depending on the purpose of the processing, nature of the personal data, and local requirements applicable to the processing.

Below we have listed some examples of the retention periods of different types of personal data processed in accordance with this Privacy Notice.

- Basic information on shareholders and information related to shareholdings are retained permanently.
- The minutes of the general meeting and the list of votes attached to it, which contain the names of the shareholders who participated in the general meeting, the names of possible proxies and aids, the number of shares and votes, and the numbers of the voting tickets, are retained permanently.
- Information related to the technical implementation of the registration system for the general meeting, voting in advance and/or during the meeting, and hall accounting will be retained for a maximum of two (2) years after the end of the general meeting.
- Other personal data collected in connection with the organization of the general meeting are destroyed when they are no longer necessary to prepare the minutes of the general meeting or to verify its correctness.

10. Protection and security of personal data

We use technical and administrative information security means that are necessary, appropriate and in line with the best practices to protect personal data and other information. Such means include, for instance, the use of firewalls, strong encryption technologies and safe IT areas, access control, restricted granting of user rights, providing instructions and training to personnel participating in personal data processing and careful selection of subcontractors. In addition to applicable legislation, the subcontractors commit to complying with Mandatum's data protection principles and guidelines.

The processing of personal data is only allowed for work-related reasons. The user rights for accessing systems that contain personal data are personal, and the use of the rights is monitored. Mandatum's employees that process personal data are bound by, in addition to the statutory non-disclosure obligation, also by a separate non-disclosure agreement. Personal data that is no longer needed is erased in secure manner.

Despite careful protection and appropriate information security, data processing always involves a risk. If, despite our measures, a data protection breach occurs and is likely to result in a high risk for your privacy or your other rights, we will contact you as soon as possible.

11. Your rights

You have the right to receive confirmation from Mandatum as to whether we are processing your personal data or not. If your personal data is processed, you have the right to receive a copy of the data and inspect the data. When submitting a request electronically, we will provide the data to you in a commonly used electronic format, unless you request otherwise. Legislation, other persons' rights and freedoms, and other special grounds may limit your right to access some of your personal data.

If you consider that your personal data processed by us is incorrect or inaccurate, you have the right to request Mandatum to rectify such personal data and complete any incomplete data.

You also have the right to request Mandatum to erase your personal data and, to the extent that the processing of your personal data is based on consent, the right to withdraw your consent. If you request the erasure of your personal data, we will erase the data from our systems, unless there is another legal basis for continuing to process the data. Please note, however, that Mandatum's business operations are subject to several statutory obligations to retain data, and Mandatum may be obligated to continue processing your personal data even if you request its erasure. In any case, we will erase your personal data after the retention period specified by us or provided by law has lapsed.

Under specific conditions provided for in legislation, you have the right to request us to restrict the processing of your personal data. In addition, you have the right to object to the processing of your personal data for direct marketing and otherwise to the extent that the processing is based on the fulfilment of legitimate interests of Mandatum or a third party.

To the extent that the processing of your personal data is based on consent or a contract, you have the right to receive the personal data you have provided yourself from us in a structured and commonly used format and the right to have the data transferred to another data controller.

You can exercise your rights described above by contacting our customer service by sending an online message through Mandatum's online service, by phone by calling +358 200 31100 (inc/mnc) from Monday to Friday at 9:00–17:00 EET/EEST, by mail to Mandatum, Customer Service, P.O. Box 627, FI-00101 Helsinki, or by visiting our nearest office. You can find our offices' contact information and opening hours on **our website**.

Right to file a complaint with a competent authority

In any matters and inquiries related to the processing and protection of your personal data, we ask that you primarily contact Mandatum's customer service as described above or the Mandatum Group's Data Protection Officer, whose contact information is provided above in section 3 of this Privacy Notice.

If you are not satisfied with the answer you received from us or if you find that the processing of personal data by us is not in accordance with data protection legislation, you can contact **the Office of the Data Protection Ombudsman** acting as the competent supervisory authority.

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